

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ELLIOT MCGUCKEN,

Plaintiff,

v.

SHUTTERSTOCK, INC., et al.,

Defendants.

Civil Action No.: 1:22-cv-00905-GHW

**NOTICE OF MOTION TO COMPEL DEFENDANT, SHUTTERSTOCK, INC., TO  
PRODUCE DISCOVERY RESPONSES AND EVIDENCE  
ORAL ARGUMENT REQUESTED**

**PLEASE TAKE NOTICE** that Plaintiff, Elliot McGucken, by its undersigned attorneys, upon the accompanying Memorandum of Law and Declaration of Burroughs, respectfully moves this Court before the Honorable Gregory H. Woods, U.S.D.J., at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 12C, New York, New York 10007, for an Order compelling Defendant, Shutterstock, Inc. to produce rule-compliant discovery responses and evidence. This Motion is brought after the pre-motion conference with the Court in accord with S.D.N.Y. Local Civil Rule 37.2.

**PLEASE TAKE FURTHER NOTICE** that Plaintiff requests oral argument if this motion is opposed.

Respectfully submitted,

Dated: August 3, 2022  
New York, New York

By: /s/ Scott Alan Burroughs  
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